

REMARKS

Claims 1-53 have been examined. New claims 54-56 have been added as indicated herein. Claims 25, 26, 41 and 42 remain objected to as being dependent upon a rejected based claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 1-24, 27-40, and 43-53 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Borella et al. (US 6,731,642). The Examiner maintains substantially the same arguments set forth in the previous Office Action, and adds new arguments in the *Response to Arguments* section on page 2 of the present Office Action.

Specifically, in the *Response to Arguments* section, the Examiner alleges:

Applicant's arguments filed on January 24, 2005, have been fully considered but they are not persuasive. Applicant's arguments center around the conversion or translation of IP and port information based on assigned ID and port number. This process is fundamental to Network Address Translation which is a well-known concept that is fundamental to the Borella invention. In Network Address Translation, one server computer is responsible for routing the network requests of many computers and "masking" them all as if they were coming from the server computer (note: a "server" computer is any computer that serves and responds to requests). Thus, every requesting computer's IP and port information is converted using an assigned ID and port number in order to be masked as the server computer.

In response, Applicant submits that the Examiner merely paraphrases the specific limitations set forth in the claimed invention by stating that, "Applicant's arguments center around the conversion or translation of IP and port information based on assigned ID and port number." Further, the Examiner merely states, without further evidence, that the features set forth in the claimed invention are well known concepts that are fundamental to the Borella invention. However, contrary to the Examiner's assertions, there is no teaching or suggestion

that the specific features cited in the previous Amendment as distinguishing the claimed invention over Borella, are fundamental to Borella. Therefore, Applicant maintains the arguments set forth in the previous Amendment.

That is, Applicant maintains, with respect to independent claim 1, that Borella does not teach or suggest at least, “converting IP and port information in a header and payload of a received or transmitted packet according to an assigned ID and port number,” as recited in claim 1. The Examiner cites column 4, lines 52-67 as allegedly satisfying the above-quoted limitation, however nowhere does Borella teach or suggest converting IP and port information in a header and payload of a received or transmitted packet, and nowhere does Borella teach or suggest that such a converting operation is performed according to an assigned ID and port number. Furthermore, at column 4, lines 66-67, Borella specifically states that port addresses need not be translated, therefore it is evident that conversion of port information is not taught or suggested by Borella. Therefore, at least based on the foregoing, Applicant maintains that independent claim 1 is patentably distinguishable over Borella.

Applicant maintains that dependent claims 2-5 are patentable at least by virtue of their dependency from independent claim 1.

With respect to independent claim 6, Applicant maintains that Borella does not teach or suggest at least, “assigning a port to a first terminal when said first terminal requests a call initiation,” as recited in claim 6. That is, nowhere does Borella even mention assigning a port to a terminal, and certainly does not discuss assigning such port to a first terminal when the first terminal requests a call initiation. The portion of Borella cited by the Examiner only mentions that some transport protocols allow the addition of a sixteen-bit port address, however, there is

no mention of a port being assigned and there is no mention of a port being assigned when said first terminal requests a call initiation. Therefore, at least based on the foregoing, Applicant maintains that independent claim 6 is patentably distinguishable over Borella.

Applicant maintains that dependent claims 7-27 are patentable at least by virtue of their respective indirect or direct dependency from independent claim 6.

Further, with respect to dependent claims 7 and 30, Applicant maintains that nowhere does Borella teach or suggest that IP and port information of a terminal is stored in the header and payload of a packet, and that such IP and port information are changed in the packet conversion.

Further, with respect to dependent claims 11-15, the Examiner cites Figure 3 of Borella as allegedly satisfying the limitations of claims 11-15. However, upon review of Borella (including Fig. 3), Borella does not satisfy several of the features set forth in claims 11-15 and 31. For example, with respect to claim 11 (from which claims 12-15 depend), Borella does not teach or suggest requesting a call initiation by said first terminal when the registration is completed. Borella (Fig. 3) does not even show a registration being completed. Further, with respect to claim 13, nowhere does Borella teach or suggest transmitting the IP and port number of said second terminal to said first terminal when the call connection is admitted. Therefore, at least based on the foregoing, Applicant maintains that dependent claims 11-15 are patentably distinguishable over Borella.

With respect to independent claim 29, as similarly argued above with respect to independent claim 1, Applicant maintains that Borella does not teach or suggest at least, “opening a channel for said second terminal according to the IP and port information of a

destination in the packet upon request of the call connection” and “converting transmitted and received packets according to the IP and port information of a first terminal and second terminal,” as recited in claim 29.

Applicant maintains that dependent claims 30-43 are patentable at least by virtue of their respective direct and indirect dependency from independent claim 29.

Further, with respect to dependent claims 27 and 43, Applicant maintains that Borella does not teach or suggest at least that “the port information is registered in a gate keeper and updated by the gate keeper when the port information is changed,” as recited in claims 27 and 43.

Finally, with respect to claim 53, Applicant maintains that Borella does not teach or suggest at least, “wherein the port is assigned to said first terminal only when said first terminal requests a call initiation,” as recited in claim 53. The Examiner does not even address the specific limitation of the port being assigned to a first terminal only when the first terminal requests a call initiation. Therefore, at least based on the foregoing, Borella does not anticipate claim 53.

Finally, Applicant adds new claims 54-56 to provide a varying scope of coverage. Applicant submits that these claims are patentable at least by virtue of their respective direct or indirect dependencies from independent claim 1. Applicant respectfully requests that these new claims be entered.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

AMENDMENT UNDER 37 C.F.R. § 1.116
U. S. Application No. 09/805,362

ATTORNEY DOCKET NO. Q62783

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.


Respectfully submitted,

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